SOCMA
SYNTHETIC ORGANIC CHEMICAL MANUFACTURERS ASSOCIATION

May 25, 2007

By Courier:
TSCA Confidential Business Information Center (7407M)
EPA East - Room 6428 Attn: Section 8(e)
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302

CONTAIN NO CBI

Re: TSCA Section 8(e) Notification

Dear TSCA Section 8(e) Coordinator:

This notification is being submitted pursuant to Section 8(e) of the Toxic Substances Control Act ("TSCA") by the Synthetic Organic Chemical Manufacturers Association (SOCMA) on behalf of OM Group, Inc. and The Shepherd Chemical Company (the "Company Sponsors"). The sponsor companies have organized their HPV testing efforts under the Synthetic Organic Chemical Manufacturers Association ("SOCMA").

The Company Sponsors have commissioned certain toxicity testing for fatty acids, tall-oil, cobalt salts (CAS No. 61789-52-4) to fulfill their voluntary commitment under the U.S. High Production Volume Chemical (HPV) Challenge program. On May 15, 2007, Dupont Haskell Laboratory notified the Company Sponsors of positive *in vitro* genotoxicity test results based on preliminary data.

Summary of Preliminary Test Results

- OECD 473: *In Vitro* Mammalian Chromosome Aberration Test

  Preliminary data for this chromosomal aberration study conducted with fatty acid, tall oil, cobalt salts was found to induce structural chromosome aberrations in the *in vitro* mammalian chromosome aberration test in Chinese hamster ovary cells in non-activated test systems. Numerical aberrations were not observed. Exposure levels ranged from 10 to 250 µg/ml. for 4 hours activated and non-activated and 20 hours non-activated The levels of chromosome aberrations were significantly different from current and historical controls at a concentration of 50µg/ml in the 20-hour non-activated study following exposures at levels ranging from 10 to 250 µg/ml. Cytogenetic evaluations were not conducted at higher exposure levels due to direct toxicity yielding a reduction of $\geq$ 50% in the number of viable cells and low mitotic indexes. Under the conditions of the test structural chromosome aberrations were found at levels above the control levels in the non-activated system only. It was concluded that the test substance was positive in this *in vitro* test.

Upon issuance of the final study report for the genotoxicity of fatty acids, tall-oil, cobalt salts by Dupont Haskell Laboratory, the sponsors will submit copies of the study report within 30 days of receipt.

Company Sponsors

The following companies are the sponsors for the genotoxicity tests:

OM Group, Inc.
127 Public Square
1500 Key Tower
Cleveland, OH 44114
Contact: Scott L. Grove, Manager, Corporate Product Stewardship

The Shepherd Chemical Company
4900 Beech Street
Cincinnati, OH 45212
Contact: Bayard Pelsor, EHS/QS Manager

Correspondence related to this 8(e) report filing should be directed to me at 202-721-4157 or jonesl@socma.com.

Sincerely,

Lynne Jones Batshon

Lynne Jones Batshon
Manager, SOCMA Visions

Cc: S. L. Grove, OM Group, Inc.
C. T. Helmes, SOCMA Visions
B. Pelsor, The Shepherd Chemical Company